

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 1:18-CR-83
v.	)	
	)	Trial Date: July 25, 2018
PAUL J. MANAFORT, JR.,	)	
	)	The Honorable T. S. Ellis, III
	)	
Defendant.	)	

**GOVERNMENT'S PROPOSED JURY INSTRUCTIONS**

Pursuant to Federal Rule of Criminal Procedure 30, the government respectfully requests the Court to include in its charge to the Jury the following general and special instructions, and further reserves the right to file any other such instructions as may become appropriate during the course of trial.

Respectfully submitted,

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Special Counsel

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Assistant United States Attorney  
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By:                     /s/                      
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INSTRUCTION NO. 30

Character Evidence – Reputation of the Defendant (If Appropriate)

The defendant has offered evidence of his or her good general reputation for [truth and veracity] [honesty and integrity] [being a law-abiding citizen]. The jury should consider this evidence along with all the other evidence in the case in reaching its verdict.

[Evidence of a defendant's reputation, inconsistent with those traits of character ordinarily involved in the commission of the crime[s] charged, may give rise to a reasonable doubt since the jury may think it improbable or unlikely that a person of good character for *[truth and veracity]* *[honesty or integrity]* *[being a law-abiding citizen]* would commit such a crime or crimes.]